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June 25, 2021

VIA ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Application Granted.

So Ordered.


P. Kevin Castel
United States District Judge

6/29/2021

Re: United States v. Collins, No. 19-cr-00395(PKC)

Dear Judge Castel:

We write regarding the approved post-trial budget for Vance Collins' case. My associate, Arletta Bussiere, has exceeded the approved budget of 654 hours by an additional 186.3 hours due to obstacles with sentencing preparation caused by the COVID-19 pandemic, along with the unusually complicated nature of Mr. Collins' sentencing memorandum, which included both novel and complex legal arguments. [We request that the approved budget be increased from 654 hours to 840.3 hours to account for the additional time.]

Social distancing requirements and difficulty accessing friends and family members made it very challenging for Ms. Bussiere to communicate with Mr. Collins' friends and family to gather information and collect support letters. She had to make numerous phone calls, and the initial difficulty in contacting Mr. Collins at Westchester County Department of Corrections made it quite burdensome to obtain his family members' contact information.

The unique circumstances of Mr. Collins' case also necessitated much additional research and briefing work on his sentencing memorandum. This is especially true with regard to the COVID-19 related arguments, which were based on entirely new case law and research, along with the many objections to the presentence report, particularly our objection regarding which Guideline applied to Mr. Collins' sentencing.

For the Court's convenience, we have included a "So Ordered" line should the Court grant our request.

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We thank the Court for its consideration.

Respectfully submitted,

/s/ Eric R. Breslin

Eric R. Breslin

cc: All Counsel of Record (VIA ECF)

SO ORDERED

Honorable P. Kevin Castel, U.S.D.J.